



## **Council for Responsible Nutrition**

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April 5, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

**RE: Docket No. 98P-0043**  
**"Per Day" Labeling for Dietary Supplements**

These comments are submitted by the Council for Responsible Nutrition (CRN), a trade association of the dietary supplement industry. CRN was formed in 1973 and represents approximately 100 manufacturers who together produce a large fraction of the dietary supplements available in the mass market, through the health food trade, and by mail order or direct sales. CRN's members include suppliers of bulk ingredients of dietary supplements as well as manufacturers of finished products. The membership encompasses manufacturers of private label products as well as national brands.

In the above-referenced document, FDA proposes to permit nutrition labeling for dietary supplements to include a column showing the amounts of dietary ingredients provided on a "per day" basis, in addition to the currently required statement on a "per serving" basis. This proposal is in response to a petition filed by a CRN member company, the Nutrilite Division of Amway Corporation.

CRN agrees with the petitioner that "per day" labeling will be helpful to consumers of products intended for consumption on multiple eating occasions. The format suggested by the petitioner and endorsed by FDA in this proposal is consistent with other applications of nutrition labeling and should be well understood by consumers.

98P-0043

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CRN appreciates the agency's action in granting the petition for "per day" labeling, and also appreciates FDA's determination that this information may be included in dietary supplement labeling on an interim basis, prior to completion of this rulemaking.

Sincerely,

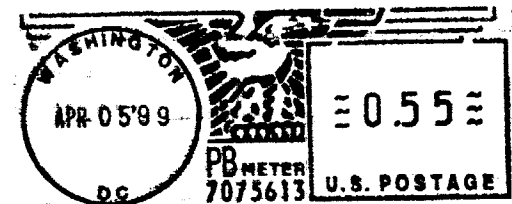
A handwritten signature in black ink, reading "Annette Dickinson". The signature is written in a cursive style with a large, stylized "A" and "D".

Annette Dickinson, Ph.D.  
Vice President, Scientific and Regulatory Affairs



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